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10 **UNITED STATES DISTRICT COURT**

11 **EASTERN DISTRICT OF CALIFORNIA**

12
13 LOURDES VASQUEZ,) Case No.: 1:24-cv-00595-JLT-BAM
14 Plaintiff,)
15 vs.) STIPULATION AND ~~PROPOSED~~ ORDER
16 Commissioner of Social Security,) FOR AN EXTENSION OF TIME
17 Defendant.)
18 _____)

19 Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the
20 parties, through their respective counsel of record, that the time for Defendant to respond to
21 Plaintiff's Motion for Summary Judgment be extended thirty (30) days from September 13,
22 2024, up to and including October 15, 2024. This is Defendant's first request for an extension.

23 Defendant requests this extension in order to further consider the administrative record in
24 light of the issues raised in Plaintiff's motion. The undersigned has a number of competing
25 deadlines in cases pending in this district and other districts.

26 The parties further stipulate that the Court's Scheduling Order shall be modified
27 accordingly.
28

1 Respectfully submitted,

2 Dated: September 10, 2024

/s/ Jonathan O. Pena*

(*as authorized via e-mail on September 10, 2024)

JONATHAN O. PENA

Attorney for Plaintiff

6 Dated: September 10, 2024

PHILLIP A. TALBERT
United States Attorney
MATHEW W. PILE
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9 By:

/s/ Erin A. Jurrens

ERIN A. JURRENS

Special Assistant U.S. Attorney

12 Attorneys for Defendant

14 **ORDER**

15 Pursuant to the parties' stipulation, and cause appearing, Defendant shall have an
16 extension, up to and including October 15, 2024, to respond to Plaintiff's Motion for Summary
17 Judgment.

18 IT IS SO ORDERED.

20 Dated: September 10, 2024

/s/ Barbara A. McAuliffe

21 UNITED STATES MAGISTRATE JUDGE